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**PACIFIC**  **TELESIS.**  
Group - Washington

July 13, 1992

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FEDERAL COMMUNICATIONS COMMISSION  
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**ORIGINAL  
FILE**

Donna R. Searcy  
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Federal Communications Commission  
1919 M Street, N.W., Room 222  
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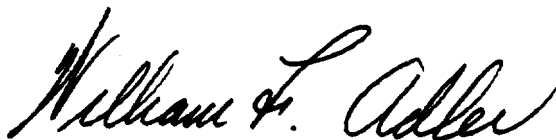
Dear Ms Searcy:

Re: *CC Docket No. 92-105 - The Use of N11 Codes and Other Abbreviated Dialing Arrangements* ✓

On behalf of Pacific Bell and Nevada Bell, please find enclosed an original and six copies of its "Reply Comments" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosures

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JUL 13 1992

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
The Use of N11 Codes and Other ) CC Docket No. 92-105  
Abbreviated Dialing Arrangements )  
\_\_\_\_\_ )

REPLY COMMENTS OF PACIFIC BELL AND NEVADA BELL

Pacific Bell and Nevada Bell ("the Pacific Companies") hereby file their reply comments in the above-captioned proceeding. The Pacific Companies continue to support the use of N11 codes for public convenience and necessity, and oppose assignment to individual parties.

N11 dialing should not be the first choice if the Commission determines that some form of alternative dialing is necessary. 7 or 10 digit dialing serves the purposes of millions of customers. It is recognizable, uniform, and available to any entity or individual. More importantly, the switches in the public switched telephone network are all equipped to handle the 7 or 10 digit dialing pattern. As shown in the comments, the same is not true for 3 digit N11 dialing.<sup>1</sup>

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<sup>1</sup> See, e.g., USTA Comments, pp. 16-18.

No party, including Cox Enterprises, has said why abbreviated dialing is necessary given the current availability of 7 or 10 digit numbers. Cox states that, "No comparable alternative dialing arrangement is available at this time, let alone any arrangement that would permit so many uses nationwide."<sup>2</sup> However, Cox ignores the North American Numbering Plan which provides 7 and 10 digit numbers for hundreds of uses nationwide, is adaptable to new technologies, and has already contributed substantial numbering resources to the information services market. Cox's argument seems to be that because a few N11 codes are not currently in use, there is no reason why it should be precluded from using these codes.<sup>3</sup>

Cox conveniently ignores the substantial detriments of N11 dialing raised by many commenters, instead blithely stating, "Consequently, the benefits of local assignment of N11 codes will come at very little cost."<sup>4</sup> However, many commenters recognized the substantial costs involved in N11 assignment, such as how to allocate an extremely scarce resource, how to reclaim a code if necessary, and the customer confusion that could result.<sup>5</sup>

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<sup>2</sup> Cox Comments, p. 4.

<sup>3</sup> Cox Comments, p. 2.

<sup>4</sup> Cox Comments, p. 5.

<sup>5</sup> See, e.g., Comments of Ameritech, Information Technology Association of America, Sprint, and Rochester Telephone.

If the Commission determines that N11 codes should be available for assignment to competitive service providers, it should restrict the assignment of N11 codes to those entities who will provide a gateway type service. Using N11 as a gateway would allow subscribers to reach many providers over a single N11 code. Further, the FCC could accomplish some standardization with respect to the types of services allowed over a particular N11 code.

Ad Hoc Telecommunications Users Committee ("Ad Hoc") suggested that another method of allowing connection for many providers would be through presubscription. Ad Hoc does not suggest that presubscription would be proper for "information type services" but does believe it would be appropriate for voice mail services.<sup>6</sup> Ad Hoc suggests that presubscription could work just like interexchange carrier presubscription. The Pacific Companies are vigorously opposed to any form of presubscription due to the costs and administrative burden involved. Many millions of dollars were spent in providing presubscription for interexchange carriers. Even now,

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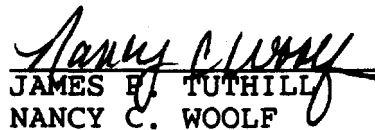
<sup>6</sup> Ad Hoc Comments, p. 9-11.

administration costs are \$1 million a year to handle continuing changes and growth in the network. Thus, the Commission should not adopt Ad Hoc's proposal for presubscription.

In conclusion, the issues and problems raised by commenters in allocating a very scarce resource among potentially thousands of entities who may find it attractive, and the competitive inequities that result cannot easily be solved. The Pacific Companies believe that the best alternatives exist in the current 7 or 10 digit dialing plan. If the Commission is going to allow assignment of N11 codes, it should carefully consider a gateway-type service in order to accommodate many providers over a single N11 code. The Pacific Companies are willing to examine the possibility of providing such a service.

Respectfully submitted,

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Their Attorneys

Date: July 13, 1992

CERTIFICATE OF SERVICE

I, Alex Kositsky, certify that the following is true and correct:

I am a citizen of the United States, State of California and over eighteen years of age.

My business address is 140 New Montgomery Street, San Francisco, CA 94105.

On July 13, 1992, I served the attached "Reply Comments of Pacific Bell and Nevada Bell" by placing true copies thereof in envelopes addressed to the parties in the attached list, which envelopes, with postage thereon fully prepaid, I then sealed and deposited in a mailbox regularly maintained by the United States Government in the City and County of San Francisco, State of California.

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By:   
Alex Kositsky

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